

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

SETH AARON PENDLEY (01)

4:21-MJ- 240-BJ

GOVERNMENT'S MOTION FOR PRETRIAL DETENTION

U.S. DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

FILED

The United States moves for pretrial detention of the defendant pursuant to 18 U.S.C. §§ 3142(e) and (f).

**1. Eligibility of Case:** This case is eligible for a detention order because the case involves:

Crime of violence [18 U.S.C. § 3156]  
 Maximum sentence of LIFE imprisonment or death  
 Controlled Substance offense punishable by 10 or more years  
 Felony with 2 prior convictions in above categories  
 Felony involving a minor victim  
 Felony involving the possession or use of a firearm, destructive device, or other dangerous weapon  
 Felony involving a failure to register under 18 U.S.C. § 2250  
 Serious risk that the Defendant will flee  
 Serious risk that Defendant will obstruct justice

APR - 9 2021

CLERK, U.S. DISTRICT COURT  
By \_\_\_\_\_  
Deputy**2. Reason for Detention.** The Court should detain the Defendant because there are no conditions of release which would reasonably assure:

Defendant's appearance as required  
 The safety of the community  
 The safety of another person

**3. The United States will invoke the rebuttable presumption against the Defendant because: there is probable cause to believe that the Defendant has committed:**

A Controlled Substance Offense punishable by 10 or more years imprisonment  
 A firearms offense under Title 18, United States Code, Section 924(c)  
 A federal crime of terrorism punishable by 10 or more years imprisonment  
 A Felony -listed in 18 U.S.C. § 3142(e) - involving a minor victim  
 A Felony involving a failure to register under 18 U.S.C. § 2250  
 The Defendant has previously been convicted of an offense described in 18 USC 3142(f)(1) which was committed while the Defendant was released on bond pending trial for any offense and less than 5 years have elapsed since the latter of the defendant's conviction or date of release from imprisonment for such conviction..

**4. Time for Detention Hearing.** The United States requests the Court to conduct the detention hearing at the Defendant's first appearance  After a continuance of 3 days.

Respectfully submitted,

PRERAK SHAH  
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above pleading was this day served upon the Defendant or his counsel of record in accordance with the provisions of Rule 49 of the Federal Rules of Criminal Procedure.

DATE: April 9, 2021
  
 ROBERT J. BOUDREAU  
 Assistant United States Attorney